

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

JACKIE BURKS; BRUNILDA PAGAN CRUZ;  
VENUS CUADRADO and RHONDA DRYE;  
individually and on behalf of all persons similarly  
situated,

Plaintiffs,

-against-

GOTHAM PROCESS, INC.; MULLOOLY,  
JEFFERY, ROONEY & FLYNN, LLP; BASSEM  
ELASHRAFI; and CARL BOUTON,

Defendants.

**No. 20 Civ. 1001 (NRM) (PK)**

**NOTICE OF MOTION**

PLEASE TAKE NOTICE, that upon the Memorandum of Law in Support of Plaintiffs' Motion for Certification of a Settlement Class and Final Approval of Class Action Settlement, and the November 6, 2023 Declaration of Jessica Ranucci in Support of Certification of a Settlement Class and Final Approval of Class Action Settlement, Plaintiffs, by their attorneys the New York Legal Assistance Group ("NYLAG"), will move this Court before the Honorable Nina Morrison, United States District Judge, at the United States Courthouse for the Eastern District of New York, at 225 Cadman Plaza, Brooklyn, NY, on November 16, 2023 at 10:30a.m., for an Order:

(i) certifying this case as a class action for settlement purposes pursuant to Rule 23(a), (b)(2), and (b)(3) of the Federal Rules of Civil Procedure, on behalf of a Class defined as "All natural persons who have been sued by MJRF, on behalf of a Civil Action Plaintiff, in New York City Civil Court in Actions commenced on or after January 1, 2016, in which an affidavit of service has been filed, stating that Bassem Elashrafi or Carl Bouton, on behalf of Gotham

Process, Inc., effectuated service by delivering the papers to a person identified as a Relative of the person to be served”;

- (ii) granting Final Approval to the Settlement Agreements of this class action; and
- (iii) granting such other relief as the Court deems just and proper.

Dated: November 6, 2023  
New York, New York

**LISA RIVERA, ESQ.**  
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